

UNITED STATES DISTRICT COURT  
DISTRICT OF NEBRASKA

TERRENCE SHANAHAN, individually and  
on behalf of all others similarly situated

Plaintiff,

v.

CARGUARD ADMINISTRATION, INC, a  
Kansas corporation, SING FOR SERVICE  
LLC, d/b/a MEPCO, an Illinois liability  
company,

Defendants.

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§ Case No. 8:21-cv-00010

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§ Hon. Brian C. Buescher

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**DEFENDANT, SING FOR SERVICE, LLC D/B/A MEPCO'S MOTION TO DISMISS  
PLAINTIFF'S COMPLAINT**

For the reasons stated in the accompanying brief, Defendant SING for Service, LLC d/b/a Mepco ("Mepco"), by and through its undersigned counsel, moves this Court under Fed. R. Civ. P. 12(b)(6) to enter an Order dismissing Plaintiff Terrence Shanahan's Complaint in its entirety against it.

SING FOR SERVICE, LLC, an Illinois limited  
liability company, d/b/a MEPCO, Defendant

By: /s/ Andrew R. Biehl

Andrew R. Biehl #25050

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on February 22, 2021 I electronically filed the foregoing document with the Clerk of the United States District Court for the District of Nebraska using the CM/ECF system of the Court which sent notification electronically of such to all CM/ECF participants.

I further certify that on February 22, 2021, I mailed by United States mail, first class, postage prepaid, the non-CM/ECF participants:

None

/s/ Andrew R. Biehl